

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

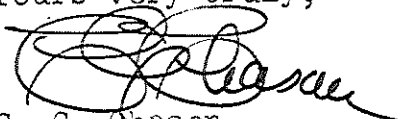
September 16, 1958

Mrs. Alice J. Duck, Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Answer in the case of Stanley Butt,
d/b/a Biloxi Fish Net Company -vs- Luke Coley.

Yours very truly,


C. G. Chason

CGC:fm

encls. 1

3638

STANLEY BUTT, d/b/a
BILOXI FISH NET COMPANY,

Plaintiff,

-vs-

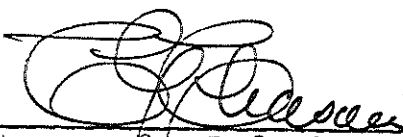
LUKE COLEY,

Defendant.

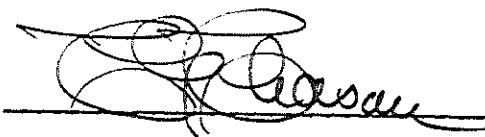
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Comes the Defendant in the above styled cause and for
answer to the Complaint hereofore filed therein, says as follows

1. That the allegations of the Complaint are untrue.
2. Defendant says that before, at or after the time when
the money complained of became due, the sum of money complained
of had been paid, in full or in part.


Attorney for Defendant

Defendant demands trial by Jury.



guy

3636 RECORDED

FILED
SEP 18 1950
ALICE J. DUCK, CLERK
REGISTER

SUMMONS

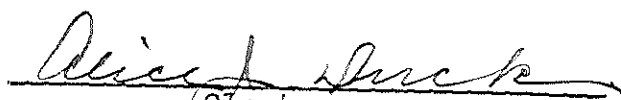
THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon LUKE COLEY, to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur to or plead to the complaint of STANLEY BUTT, d/b/a BILOXI FISH NET CO.

Witness my hand this the // day of August, 1958.


Clerk

CC

COMPLAINT

STANLEY BUTT, d/b/a)
BILOXI FISH NET CO.)
PLAINTIFF)

VS:)

LUKE COLEY)
DEFENDANT)

IN THE CIRCUIT COURT OF

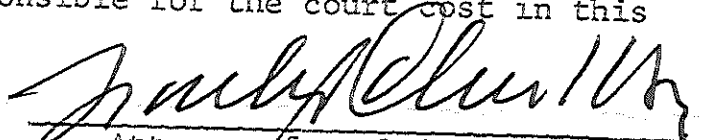
BALDWIN COUNTY, ALABAMA

AT LAW

The plaintiff claims of the defendant the sum of NINE HUNDRED & 00/100 DOLLARS (\$900.00), due by promissory note made by the defendant on the 27th day of January, 1958 and payable to Mrs. Hans Christensen on the 27th day of March, 1958 (60 days after date) endorsed and negotiated by said Mrs. Hans Christensen to the plaintiff for value, before maturity, with interest thereon.

Said note waives all rights as to exemptions and provides for a reasonable attorney's fee which plaintiff alleges to be \$180.00.

I do hereby agree to be responsible for the court cost in this case.


Attorney for Plaintiff

Defendant's address is:
Gulf Shores, Alabama

RECEIVED
No. 3638

Received 8 day of Aug 1958
and on 19 of Aug 1958
I served a copy of the within STC
on Luke Coley
By service on _____

TAYLOR WILKINS, Sheriff
By Charles D. S.

Self Power

Sheriff claims 100 miles at
Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff
BY Childress
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

STANLEY BUTT, d/b/a
BILOXI FISH NET CO.

VS:

LUKE COLEY

FILED
AUG 11 1958
ALICE L. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOBILE, ALA. Jan 27th 1958

Sixty days

AFTER DATE, WITHOUT GRACE l PROMISE TO PAY TO

THE ORDER OF Mrs Hans Christensen \$ 1000⁰⁰

One Thousand & no/100 DOLLARS

FOR VALUE RECEIVED, PAYABLE AT The Merchants National Bank of Mobile, Ala.

THE PARTIES TO THIS INSTRUMENT, WHETHER MAKER, ENDORSER, SURETY, OR GUARANTOR, EACH FOR HIMSELF, SEVERALLY AGREES: (A) TO PAY THIS NOTE; (B) TO PAY INTEREST THEREON AT THE RATE OF 6 PER CENTUM PER ANNUM, UNLESS OTHERWISE EXPRESSLY STIPULATED HEREIN, AND THAT SUCH INTEREST MAY BE COLLECTED BY THE PAYEE OR OWNER OF THE NOTE DISCOUNTING THE SAME, OR, IF THE NOTE SHOWS ON ITS FACE THAT IT BEARS INTEREST, BY THE OWNER THEREOF COLLECTING THE INTEREST AT ITS MATURITY; (C) THAT, IN ALL EVENTS, THIS NOTE, FROM THE DATE OF ITS MATURITY, SHALL BEAR INTEREST AT THE RATE OF EIGHT PER CENTUM PER ANNUM UNTIL PAID. EACH OF SAID PARTIES WAIVES, AS TO THIS DEBT, ALL RIGHT OF EXEMPTION UNDER THE CONSTITUTION AND LAWS OF ALABAMA, OR ANY OTHER STATE, AND THEY EACH SEVERALLY AGREE TO PAY ALL COSTS OF COLLECTING OR SECURING, OR ATTEMPTING TO COLLECT OR SECURE, THIS NOTE, INCLUDING A REASONABLE ATTORNEY'S FEE, WHETHER THE SAME BE COLLECTED OR SECURED BY SUIT OR OTHERWISE, AND THE MAKER, ENDORSER, SURETY, OR GUARANTOR OF THIS NOTE SEVERALLY WAIVES DEMAND, PRESENTMENT, PROTEST, NOTICE OF PROTEST, SUIT, AND ALL OTHER REQUIREMENTS NECESSARY TO HOLD THEM.

Owing writing Trans & other material

*M/V. MISS LILLIAN
Luke Coley*

DUE _____

Pay to People Bank
Bilal Fish, Inc.
Stanley Smith

[illegible][illegible]